

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas

FILED

July 10, 2025

United States of America

v.

Brandon Lee Jones

Nathan Ochsner, Clerk of Court

Case No. **3:25-MJ-0010**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of \_\_\_\_\_ in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21 USC Section 846

Offense Description

Federal Drug Conspiracy

This criminal complaint is based on these facts:

See attached Affidavit of probable cause

☒ Continued on the attached sheet.



Complainant's signature

Special Agent Kenneth Smith

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/10/2025

City and state: Beyl, OR  
Houston, Texas



Judge's signature

Judge Andrew Edison

Printed name and title

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Kenneth Smith, being duly sworn, do hereby depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the Houston Division, in Houston Texas. I have been so employed since November of 2012. As part of my duties as a Special Agent, I am currently assigned to the Texas City Resident Agency. This squad investigates various violations, to include violent crime and organized crime. I have participated in the execution of search warrants and the debriefing of defendants, witnesses, and informants. I have been trained to participate in federal investigations that could result in the arrest and conviction of individuals, who have violated federal law. As a Special Agent, I am authorized to investigate violations of law of the United States and execute warrants issued under the authority of the United States.
  
2. The facts contained in this affidavit are based on my knowledge, training, and experience and upon information provided to be by other law enforcement individuals. Since this affidavit is made for the limited purpose of supporting probable cause for a Criminal Complaint, I have not set forth every fact learned during the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only:

3. The facts in support of this affidavit and contained in the following paragraphs are the result of a joint investigation by the Federal Bureau of Investigation (FBI) and Houston Police Department (HPD) into a criminal organization operating in the Galveston and Harris County. This organization is known as the Lake Side Crips. The purpose of the Lake Side Crips is to profit in the trafficking of controlled substances.
4. BRANDON LEE JONES (JONES) has been identified through this investigation to be a member of the Lake Side Crips. This affidavit is being submitted in support of a criminal complaint charging JONES with conspiracy to possess with the intent to distribute a controlled substance, in violation of Title 21 United States Code, Section 846.
5. I have not included each and every fact known concerning this investigation but have not omitted any material that undermines the statements and conclusions herein. I have set forth only the facts that I believe are necessary to establish probable cause to show JONES violated Title 21 United States Code, Section 846.

#### **PROBABLE CAUSE**

6. In June 2025, a FBI Confidential Human Source (CHS) introduced JONES to a FBI Undercover Employee (UCE-1) for the purposes of being able to provide JONES with bricks of cocaine. On June 13, 2025, UCE-1 and JONES spoke on the phone. The conversation was recorded. During the conversation, UCE-1 and JONES spoke

about meeting up, so that UCE-1 could provide JONES with what was represented by UCE-1 to be two cocaine bricks, for a price of \$13,500 per brick.

7. On July 9, 2025, the JONES met with UCE-1 and a second Undercover Employee (UCE-2) at a truck stop in Deer Park, Texas. During the meeting, UCE-1 stated he would be able to provide the JONES with what was represented by UCE-1 to be three cocaine bricks instead of the two originally agreed upon. After JONES agreed to take the three bricks, UCE-1 negotiated the price for all three bricks to be \$40,000. After agreeing on this price, UCE-1 contacted a third Undercover Employee (UCE-3) who drove to the meeting location with a bag with what was represented to JONES to be cocaine. After arriving, UCE-3 provided the bag of what was represented to be cocaine to UCE-1. After UCE-3 departed the location, UCE-1 opened the bag and showed the contents to JONES. JONES looked into the bag which contained what was represented to be cocaine, and then took it from UCE-1. After taking possession of the bag with what was represented to be cocaine, JONES placed the bag with what was represented to be cocaine in the back seat of JONES' vehicle.
8. After JONES placed the bag with what was represented to be cocaine in the back seat of his vehicle, JONES was arrested.
9. Following his arrest, JONES was read his Miranda Rights. After waiving his right to counsel, Jones stated he had gone to the meeting with UCE-1 to obtain cocaine.

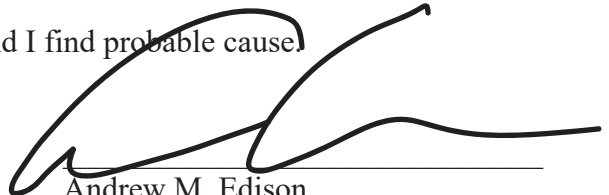
During the interview, JONES stated he had taken possession of what he perceived to be cocaine from UCE-1.

10. Based on the foregoing facts, I believe that there is probable cause that on July 9, 2025, BRANDON LEE JONES conspired to possess with the intent to distribute more than 2 kilograms of cocaine in violation of Title 21 United States Code, Section 846.



Kenneth Smith  
Special Agent  
Federal Bureau of Investigation

Sworn to before me on 10<sup>th</sup> day of July 2025 and I find probable cause.



Andrew M. Edison  
United States Magistrate Judge